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IN REPLY REFER TO:
5090
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SEP 05 1997

CERTIFIED MAIL RETURN RECEIPT REQUESTED

North Carolina Department of Environment,
Health and Natural Resources
Attn: Mr. Dave Lown
Superfund Section
P. O. Box 27687
401 Oberlin Road
Raleigh, North Carolina 27611-7687

Re: MCB Camp Lejeune Response to Comments
Draft Site Investigation Site 10-Original
Base Landfill

Dear Mr. Lown:

Enclosed please find Navy/Marine Corps responses to your comments dated March 6, 1997 on the subject document. These responses will be incorporated into the final version of the document scheduled for distribution on September 26, 1997.

Please direct any questions or comments to Ms. Katherine Landman at (757) 322-4818.

Sincerely,

For L. E. SAKSVIG, P.E.
Head
Installation Restoration Section
(South)
Environmental Programs Branch
Environmental Division
By direction of the Commander

Enclosure

Copy to: (w/encls)
EPA Region IV (Ms. Gena Townsend)
MCB Camp Lejeune (Mr. Neal Paul, Mr. Mick Senus)
Baker Environmental, Inc. (Mr. Matt Bartman, Mr. Jim Culp)
Activity Admin Record File

RESPONSE TO COMMENTS
SUBMITTED BY DAVE LOWN OF THE NORTH CAROLINA DEPARTMENT OF ENVIRONMENT, HEALTH AND NATURAL RESOURCES (NC DEHNR)
DIVISION OF SOLID WASTE MANAGEMENT
DATED MARCH 6, 1997
DRAFT PROJECT PLANS FOR THE SITE INVESTIGATION
AT SITE 10 - ORIGINAL BASE LANDFILL
MARINE CORPS BASE CAMP LEJEUNE, NORTH CAROLINA

Work Plan

1. The typo will be changed to reflect the comment.

2. North Carolina Risk Analysis Framework Method I Target Concentrations protective of groundwater will be added to Tables 2-3 through 2-6. Section 2.2.5.1 discusses the concentrations of compounds detected during the expedited site characterization and evaluation and a comparison to Region III Risk-Based Concentrations. Additional information will be added to this section discussing the comparison of the contaminant's concentration with regard to the North Carolina Risk Analysis Framework Method I Target Concentrations protective of groundwater. In addition, data gathered during the proposed SI will be compared to these same criteria.

3. Data collected during the expedited site characterization did not indicate that chlorinated organic contamination was present at the site. In order to determine that natural attenuation of chlorinated organics may be occurring, evidence such as the daughter products of TCE should be present. Then, additional analyses are needed to support a natural attenuation remedy. If chlorinated solvents are detected during the SI, additional wells will be needed to determine if the concentrations increase with depth and establish the vertical extent of contamination. At this later phase it may be prudent to implement the necessary types of analyses to support natural attenuation.

4. The sentence will be rewritten for clarity and in the final version will be as follows:

   A soil boring will be advanced at each grid point (23 soil borings total) across the site (Figure 4-10).

5. Surface water observed during the site visit in September 1996 was believed to be the result of the tropical storms that had occurred within a couple of weeks prior to the visit. If the surface water is present during the SI, samples will be collected and analyzed for the same analyses as the groundwater samples proposed for the site. However, samples were not proposed for either Wallace or Bearhead Creeks due to the extensive sampling that was done during the Site 6 and 82 investigations and the distance between the suspected location of Site 10 and the creeks.

6. Figure 2-3 will be deleted and references to this figure in the text will be changed to cite the original source as a reference, the USGS Report 93-4049.

7. The figure will be modified as per the comment.

8. References to the ESD, Environmental Compliance Branch Standard Operating Procedures and Quality Assurance Manual (ECBSOPQAM), February 1, 1991 will be changed to ESD, Environmental Investigations Standard Operating Procedures and Quality Assurance Manual (EISOPQAM), May 1996. In addition, the procedures specified for soil collection will be compared to the new Standard Operating Procedures (SOPs) to ensure compliance.

9. The EISOPQAM was consulted with regard to low-flow purging and sampling for temporary wells

and changes will be made in the proposed procedures in order to comply with the new SOPs.

10. Sections 6.7.4 will be modified to indicate that soil IDW may need to be tested for full scan TCL organics and TAL metals depending on disposal method chosen. The decision on whether or not to conduct these tests will be made upon review of preliminary site sampling results and consideration of appropriate disposal options. Full scan TCL organics and TAL metals will be required if soil IDW is to be placed back on site; these results must be used to determine that the soil IDW contaminant levels are low enough to be protective of groundwater. This can be calculated following the procedure outlined in the Draft NC Risk Analysis Framework. Testing for TCLP will be required if these test results indicate that soil IDW would not be protective of groundwater; in this case, the IDW must be disposed of off-site and the receiving facility would require the TCLP test. If preliminary site sampling results indicate that soil IDW is grossly contaminated such that the requirement for off-site disposal is presumed, the full scan TCL organics and TAL metals testing may be omitted and only the TCLP test performed.

11. This comment referred to previous comment 10. Text will be added to Section 6.7.9 to indicate the various types of disposal options for IDW usually considered and the types of IDW testing that are required for each disposal option. See response to comment 10.

12. This comment referred to previous comment 8. The reference in Section 7.0 to the old ECBSOPQAM will be corrected to refer to the new EISOPQAM published in May 1996. Procedures described in Section 7.0 and referenced appendices will be reviewed and updated as necessary to ensure compliance with the new SOPs.

Quality Assurance Project Plan

13. The CRQLs listed in Table 8-1 are from the USEPA Contract Laboratory Program Statement of Work for Organics Analysis. Since the work to be conducted at the site is to determine if gross contamination is present at the site and not to determine remediation goals, Baker believes that the additional laboratory costs associated with lower CRQLs is not necessary at this time. If contamination is discovered at the site and further investigation is warranted, then the recommendation of using the EPA's Low Concentration Organic Analytical Service for Superfund will be reconsidered. The CLP CRQLs will satisfy the Data Quality Objectives for the statement of work for this stage of the investigation.